

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

DOUGLAS HANDSHOE

PLAINTIFF

VS.

CIVIL ACTION NO. 1:15-cv-00113-KS-RHW

TORSTAR CORPORATION (DBA
TORONTO STAR NEWSPAPERS LTD.)
PETER EDWARDS

DEFENDANTS

**DECLARATION OF PETER EDWARDS IN SUPPORT OF TORSTAR CORPORATION
AND PETER EDWARDS'S MOTION TO DISMISS
PLAINTIFF'S CIVIL COMPLAINT FOR DAMAGES**

I, Peter Edwards, declare that:

1. I am a resident of Canada. I am employed by Toronto Star Newspapers Limited ("TNSL"), a wholly-owned subsidiary of Torstar Corporation, as a reporter for *The Toronto Star*. I have been employed by TNSL for over 25 years. I have personal knowledge of all of the facts set forth in this Declaration based upon information obtained from various sources, including my own personal knowledge and experience as a reporter for *The Toronto Star*, as well as documents and records maintained in the regular course of business. I make this Declaration based on my personal knowledge and reliable business records and sources of information as to the following facts and circumstances, and I could and would competently testify to these matters if called as a witness.

2. On February 24, 2014, an article entitled "Nova Scotia Couple Wins Copyright Lawsuit against Homophobic U.S. Blogger" was published on *The Toronto Star's* website.

3. I wrote the subject article in Canada and primarily relied on the Supreme Court of Nova Scotia's decision to do so.

EXHIBIT

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4. I contacted Mr. Douglas Handshoe by e-mail for comment on the Supreme Court of Nova Scotia's decision, and this was my only contact with Mississippi. I did not visit Mississippi to write the subject article, and I have never visited Mississippi at all.

5. I first learned of Mr. Douglas Handshoe's lawsuit upon receipt of the Complaint on March 13, 2015. I have not received any other correspondence or notice from Mr. Handshoe regarding the subject article.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 23, 2015.



Peter Edwards